

Eric Osterling

From: Gruber Farms <gruberfarms1@gmail.com>
Sent: Friday, August 5, 2022 7:48 PM
To: Eric Osterling
Subject: Rules and Regulations 07-22-22 Comment

Aug 5, 2022

Greater Kaweah GSA
Eric Osterling and the GKGSA Board and Committee members.

My comments for the Rules and Regulation draft dated 07/22/2022

Section 2.02 You stated in the Rules and Regulations:

“For all wells constructed after the date of the first adoption of the GKGSA Rules and Regulations flowmeters satisfying the conditions and criteria prescribed by this Section 2.02 shall be the only permissible means for measurement of groundwater extractions”

GKGSA is already using Land IQ for the ET data. If an owner needs to have a new well installed, why are you going to punish them by making them go with more expense on buying/installing a flow meter plus maintain it. This will be another burden on the farmer that is trying to make a living. Land IQ has the data so it should be the choice of the land owner if they want to use Land IQ or a flow meter. Using flow meters will cost the landowners more money and the GKGSA time and money for having to read and police the meters.

Section 3.02

I do not see where Precipitation is listed under the Groundwater Accounting/Online Dashboard
The Precipitation should be in the Rules and Regulations since it will be used.

Section 4.03 Carryover and Transfers

There needs to be a section on lease land. Some farmers have signed leases between the Lessee and the Lessor. The farmer would benefit using the allocation from lease land for their total allocation. As I read it, doing a transfer between different owners will trigger a transfer loss. This loss should be waived on lease land. If a Lessee has a signed lease with the Lessor, then ALL of the allocation should be used and flowmeters not required. The farmer is already paying the Lessor for the lease, they should not have to be burdened with more expense from the GSA just because they are farming lease land.

Section 5.02 Groundwater Extraction Fees

30 days to pay any invoice given to the landowner is too short of time for the landowner. The time should be at least 60 days.

Thank You
Dee Dee Gruber